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**Hearing Date and Time:**  
**November 5, 2008 at 10:00 a.m.**

*Attorneys for Cargill Investment Group, Ltd.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>Lehman Brothers Holdings, Inc., et al.,</b>	:	<b>Case No. 08-13555 (JMP)</b>
	:	
<b>Debtors.</b>	:	<b>Jointly Administered</b>
-----X	:	
	:	
<b>SECURITIES INVESTOR PROTECTION CORPORATION,</b>	:	
	:	
<b>Plaintiff-Applicant,</b>	:	<b>Adv. Proc. No. 08-01420</b>
	:	
<b>v.</b>	:	<b>SIPA Liquidation Proceeding</b>
	:	
<b>Lehman Brothers, Inc.</b>	:	
	:	
<b>Defendant.</b>	:	
-----X	:	

**NOTICE OF HEARING OF MOTION FOR RELIEF  
FROM AUTOMATIC STAY TO TERMINATE MANAGEMENT  
AGREEMENT AND FOR ALLOWANCE AND PAYMENT OF  
ADMINISTRATIVE EXPENSE CLAIM**

**PLEASE TAKE NOTICE**, that on November 5, 2008 at 10:00 a.m. [New York Time]  
or as soon thereafter as counsel may be heard, a hearing will be held before the Honorable James  
M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court for the  
Southern District of New York (the "Bankruptcy Court"), Alexander Hamilton Custom House,

Courtroom 601, One Bowling Green, New York, New York 10004, to consider Cargill Investment Group, Ltd.'s (the "Movant") motion for relief from the automatic stay to permit Movant to terminate a Second Management Agreement with Lehman Brothers, Inc. ("LBI") and for allowance and payment of Movant's administrative expense claim for services rendered under the Second Management Agreement after the date of commencement of LBI's Securities Investor Protection Act proceeding (the "Motion").

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the Motion must be: (a) in writing, stating the name of the objecting party and shall state with particularity the reasons for the objection; (b) filed with the Clerk of the Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 (with a courtesy copy to Judge Peck's Chambers) in accordance with the procedures in the paragraph immediately below; and (c) served upon the undersigned counsel for Movant so as to be received no later than October 31, 2008.

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the relief sought in the Motion must be filed: (a) through the Bankruptcy Court's electronic filing system; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number of the document to which the objection refers, and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such party shall submit the objection on a diskette in either Word, WordPerfect, or DOS text (ASCII) format to the Clerk of the Bankruptcy Court with a label containing the information indicated in section (b) of this paragraph. An objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in this paragraph.

**PLEASE TAKE FURTHER NOTICE** that the Court may grant the relief requested in

the Motion without a hearing if no objections to the Motion are timely filed and served.

**PLEASE TAKE FURTHER NOTICE**, that the hearing to consider the Motion may be adjourned from time to time, without further notice to parties in interest, other than the announcement of the adjourned date or dates at the hearing.

Dated: Uniondale, New York  
October 4, 2008

**FARRELL FRITZ, P.C.**  
*Attorneys for Cargill Investment Group, Ltd.*

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